

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

IN RE:)
)
Surina Lynn Brown) Case No. 14-11710
) (Chapter 7)
Debtor(s).)

**DEBTOR'S OBJECTION TO FREEDOM MORTGAGE CORP'S MOTION FOR RELIEF
FROM THE STAY AND BRIEF IN SUPPORT**

The Debtor, SURINA LYNN BROWN, through counsel, AARON D. COMPTON, objects to Freedom Mortgage Corp.'s Motion for Relief from Automatic Stay and Abandonment Of Property [Doc.56] filed 08/17/2015 and moves this Court for an Order to Denying Movant's Motion and is support thereof states the following:

1. The Debtor converted her case from a Chapter 13 to a Chapter 7 because she was unable to make her plan payments. Debtor lost her Worker's Compensation coverage and is unable to work due to a catastrophic and progressive medical disability.
2. Debtor has asked her Mortgage Company to consider modifying her loan under HAMP and submitted the necessary documents on July 20, 2015. Debtor has sought a status update from the mortgage company individually and through her attorney. To date, all requests for status of her application have been denied.
3. Debtor denies that the Movant will suffer irreparable injury.
4. Lifting the stay on this Debtor would create a hardship on the Debtor. The Debtor does not have the physical or financial ability to move or relocate. This Objection was drafted and filed pro bono.
5. The Debtor has insured the property against loss.
6. The Debtor has equity in the property.

WHEREFORE, Debtor, respectfully requests this Court enter an order denying the Motion of Freedom Mortgage Corp for Relief from Automatic Stay and Abandonment Of Property as requested herein and grant such additional relief as this Court deems equitable.

/s/ Aaron D. Compton

Aaron D. Compton OK Bar No. 31968
AARON D. COMPTON, ATTORNEY AT LAW, PLLC
4216 N. Portland Ave. Suite 200
Oklahoma City, OK 73112
Office: (405) 578-4529
Email: Adcompton777@gmail.com

ATTORNEY FOR DEBTOR

CERTIFICATE OF SERVICE

I hereby certify that on this 20th day of August, 2015, a true and correct copy of this Objection was electronically served using the CM/ECF system.

I further certify that on this 20th day of August, 2015, a true and correct copy of this Motion was forwarded first class U.S. Mail, postage pre-paid and properly addressed to the following:

Joel C. Hall
210 Park Ave
3030 Oklahoma Tower
Oklahoma City, OK 73102
Panel Trustee

Jim Timberlake
4200 Perimeter Center, Ste 100
Oklahoma City, OK 73102
Attorney for Movant

/s/ Aaron D Compton

Aaron D Compton